UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

            Plaintiff,

    v.

TOM ALLEN MANUEL,

                                     INDICTMENT

            Defendant.

_____/

    The Grand Jury charges:

COUNT 1
Felon in Possession of a Firearm

On or about October 27, 2023, in the City of Lansing, in the Southern Division of

the Western District of Michigan,

TOM ALLEN MANUEL,

knowing he had previously been convicted of a crime punishable by imprisonment for a

term exceeding one year, knowingly possessed a loaded Ruger .22 caliber revolver with

an obliterated serial number, and the firearm was in and affecting commerce.

18 U.S.C. § 922(g)(1)
18 U.S.C. § 921(a)
18 U.S.C. § 924(a)(8)

COUNT 2
Possession of a Firearm with an Obliterated Serial Number

On or about October 27, 2023, in the City of Lansing, in the Southern Division of

the Western District of Michigan,

TOM ALLEN MANUEL,

knowingly possessed a firearm, specifically a Ruger .22 caliber revolver from which the

manufacturer's serial number had been removed, altered, and obliterated and which had

been shipped and transported in interstate or foreign commerce.

18 U.S.C. § 922(k)
18 U.S.C. § 924(a)(1)(B)

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

Upon conviction of one or both of the offenses in violation of 18 U.S.C. §§ 922(g)(1) and 922(k), set forth in Counts 1 and 2 of this Indictment, the defendant,

TOM ALLEN MANUEL,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the offenses, including, but not limited to, the Ruger .22 caliber revolver together with associated ammunition.

18 U.S.C. § 924(d)(1)
28 U.S.C. § 2461(c)

A TRUE BILL

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GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney

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TIMOTHY VERHEY
Assistant United States Attorney

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